

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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KALIEF WILLIAMS,

Plaintiff,

-against-

Case No.: 1:21-cv-2922 (EK) (CLP)

NOTICE OF MOTION

THE RUSSO’S PAYROLL GROUP, INC. d/b/a
RUSSO’S ON THE BAY, FRANK RUSSO, JR.,
ROBERT “ROBBIE” RUSSO, and GIUSEPPE
“JOE” VACCA,

Defendants.

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PLEASE TAKE NOTICE, that upon the accompanying memorandum of law in support, and all the prior papers and proceedings herein, Defendant Robert Russo will move this Court, before the Hon. Cheryl M. Pollak, U.S.M.J., at the United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Courtroom 13B South, Brooklyn, NY 11201-1804, for an Order: (i) vacating the certificate of default entered against Defendant Robert Russo on November 10, 2021 pursuant to Rule 55(c) of the Federal Rules of Civil Procedure (hereinafter “Rules” or “Rule”); and (ii) for such other and further relief as this honorable Court deems just, equitable, and proper.

Pursuant to this Court’s Motion Procedures and Rules and this Court’s Order dated April 19, 2022, Plaintiff’s opposition papers are due by May 20, 2022 and Defendant’s reply papers in further support are due by May 27, 2022.

Dated: Lake Success, New York
May 13, 2022

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